



Myron Burr
Sr. Mgr. EHS

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2016-04-22

VIA E-MAIL

Harold R. Moore III
Nationwide Indemnity Company
Environmental Claim Unit
94 Lake Street
Salem, NH 03079

Re: **Siltronic Corporation's Independent Counsel Fees**
Siltronic Corporation v. Employers Insurance Company of Wausau, et al.
USDC Case No. 11-CV-1493-ST
Our File No. 46454-38912

Dear Harold:

As you know, Judge Stewart's Second Amended Opinion and Order in the pending case unequivocally states that Wausau has a duty to defend Siltronic Corporation under the 1978-79 Policy, which was triggered by Siltronic's 2003 tender of defense to Wausau. That ruling was issued before Siltronic tendered, on March 23, 2016, its additional demand for defense related to the recent discovery of dioxin-contaminated groundwater and soil located at the Siltronic property.

Under either circumstance, Siltronic is due at least defense from Wausau. Please confirm that Wausau will, at last, immediately undertake its defense obligations, with or without a reservation of rights as you deem appropriate. If the former, Siltronic will respond.

Your prompt attention to this matter is appreciated. If I don't hear from you within 14 calendar days, I must assume that this demand is rejected and Siltronic must then proceed in that light.
Best regards,

Siltronic Corporation



Myron Burr, PE
Sr. Manager EHS



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cc: Christopher L. Reive
Robert Horkovich
Bryan M. Barber
W. David Campagne
Steven Soha
Gary V. Abbott